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**From:** Johnson, Marion [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3D10084D4CB247CEA03C9C43C770B7F5-MARION J. JOHNSON]  
**Sent:** 12/11/2020 3:04:34 PM  
**To:** Goodis, Michael [Goodis.Michael@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]; Aubee, Catherine [Aubee.Catherine@epa.gov]  
**BCC:** Adeeb, Shanta [Adeeb.Shanta@epa.gov]; Rate, Debra [Rate.Debra@epa.gov]  
**Subject:** RE: For Alex/Rick/Ed Review: Tampa Outlet; AldiCarb; DDL; ASAP

Good to know! Thanks, Mike!

MJJ

Marion J. Johnson, Jr.  
Chief, Invertebrate-Vertebrate Branch 2  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
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(703) 305-6788  
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**From:** Goodis, Michael <Goodis.Michael@epa.gov>  
**Sent:** Friday, December 11, 2020 9:56 AM  
**To:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>  
**Subject:** FW: For Alex/Rick/Ed Review: Tampa Outlet; AldiCarb; DDL; ASAP  
**Importance:** High

FYI

Michael L. Goodis, P.E.  
Acting Deputy Director for Programs  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
571-309-5497 (cell)

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**From:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>  
**Sent:** Thursday, December 10, 2020 5:24 PM  
**To:** Dennis, Allison <[Dennis.Allison@epa.gov](mailto:Dennis.Allison@epa.gov)>; Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Cc:** Mills, Madeline <[Mills.Madeline@epa.gov](mailto:Mills.Madeline@epa.gov)>; Bolen, Derrick <[bolen.derrick@epa.gov](mailto:bolen.derrick@epa.gov)>; Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>; Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>  
**Subject:** RE: For Alex/Rick/Ed Review: Tampa Outlet; AldiCarb; DDL; ASAP  
**Importance:** High

Edits below.

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**From:** Dennis, Allison <[Dennis.Allison@epa.gov](mailto:Dennis.Allison@epa.gov)>

**Sent:** Thursday, December 10, 2020 5:14 PM

**To:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>; Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>

**Cc:** Mills, Madeline <[Mills.Madeline@epa.gov](mailto:Mills.Madeline@epa.gov)>; Bolen, Derrick <[bolen.derrick@epa.gov](mailto:bolen.derrick@epa.gov)>; Richmond, Jonah <[Richmond.Jonah@epa.gov](mailto:Richmond.Jonah@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>; Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>

**Subject:** For Alex/Rick/Ed Review: Tampa Outlet; AldiCarb; DDL; ASAP

A local Tampa outlet is writing tonight, they are looking for comment from us to include in their story about the PR below. How's this (I think we will take public comment but can someone confirm?):

## Ex. 5 Deliberative Process (DP)

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**From:** Dennis, Allison

**Sent:** Thursday, December 10, 2020 4:41 PM

**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>

**Cc:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>

**Subject:** Head's up; CBD PR on AldiCarb

Just a head's up about this CBD PR . We're working on answering some press q's resulting from this release.

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**From:** Nathan Donley <[ndonley@biologicaldiversity.org](mailto:ndonley@biologicaldiversity.org)>

**Sent:** Thursday, December 10, 2020 11:44 AM

**To:** Meszaros, Jessica <[jmmeszaros@wusf.org](mailto:jmmeszaros@wusf.org)>

**Subject:** EPA to Consider Reapproving Previously Banned Use of Extremely Toxic Pesticide Aldicarb on Citrus Trees in Florida, Texas

For Immediate Release, December 10, 2020

Contact: Nathan Donley, Center for Biological Diversity, (971) 717-6406,

[ndonley@biologicaldiversity.org](mailto:ndonley@biologicaldiversity.org)

Karen McCormack, former staffer in EPA pesticide office, [klmccormack55@gmail.com](mailto:klmccormack55@gmail.com)

### **EPA to Consider Reapproving Previously Banned Use of Extremely Toxic Pesticide Aldicarb on Citrus Trees in Florida, Texas**

#### ***Dangerous Neurotoxin Linked to Brain Damage Is Banned in Over 100 Countries***

WASHINGTON— In what will likely be the first major pesticide decision under the Biden Environmental Protection Agency, the agency will consider allowing use of the dangerous, previously cancelled pesticide aldicarb on citrus trees in Florida and Texas.

If approved the manufacturer's application would allow use of the highly toxic pesticide linked to brain damage in young children and infants on up to 400,000 acres of orange, grapefruit, lemon and lime trees in the two states.

The proposal by AgLogic, the sole manufacturer of aldicarb, to dramatically escalate use of the pesticide that is banned in more than 100 countries across the globe comes a decade after an agreement was in place to cancel its use entirely in the United States.

“The fact that U.S. regulators would even consider expanding use of this dangerous, widely banned pesticide is a stunning indictment of our broken regulatory system,” said Nathan Donley, a senior scientist at the Center for Biological Diversity. “This application vividly reaffirms why the pesticide industry considers us the dumping ground for the world’s worst pollutants. We’ll be watching closely to see whether the Biden administration steps up and puts public health before pesticide company profits.”

Aldicarb is classified as “extremely hazardous” by the World Health Organization — its highest toxicity category — and one of only 35 pesticides subject to regulation under the Rotterdam Convention, an international treaty designed to reduce trade of the most hazardous chemicals in the world. The United States is one of only a few countries around the world that has not ratified the treaty.

In 2010 the EPA and Bayer reached an agreement to end the use of aldicarb in the United States after the EPA found that its ongoing use posed unacceptable dietary risks to infants and young children. The crop use that resulted in the highest risk to infants and children was citrus, which Bayer agreed to cancel immediately. While the other uses of aldicarb were being phased out, AgLogic applied for, and received, approval for use on a small subset of other crops. If approved on citrus, aldicarb use would dramatically increase.

“It’s deeply disappointing to watch the current EPA renege on its agreement to ban this highly toxic and persistent pesticide,” said Karen McCormack, a retired employee of the EPA’s pesticide office. “After receiving numerous complaints of aldicarb leaching into ground water and contaminating drinking water supplies in Florida and elsewhere, my colleagues worked tirelessly to reach a voluntary agreement with the aldicarb manufacturer to stop producing this hazardous pesticide. Now it appears all this work may have been in vain.”

AgLogic tried to gain a “Special Local Needs” approval (also called a FIFRA Section 24(c) approval) for use of aldicarb on Florida citrus in 2017 and 2018. Freedom of Information Act documents obtained by the Center show the Florida Department of Agriculture and the EPA’s pesticide office — often aligned with pesticide-industry interests — ultimately indicated they would deny the 24(c) approval, prompting the company to withdraw its application.

Among the reasons for denial of the 24(c) approval by the Florida Department of Agriculture was that AgLogic failed to demonstrate that use of aldicarb was any better at controlling pests than other, safer alternatives.

Undeterred, AgLogic is currently seeking a FIFRA Section 3 approval, which is the typical mechanism for a pesticide approval, noting that “...for Section 3 registrations EPA does not require the submission of comparative efficacy studies.”

Amid growing evidence of a dramatic decline in insect populations, including pollinators, AgLogic has also indicated it intends to request a waiver for the typically required pollinator-toxicity studies to expedite Section 3 approval on citrus.

This application comes as representatives from the citrus industry have been lobbying the EPA to approve use of the neurotoxic pesticide on the nation’s citrus. The lobbying efforts included a meeting with the agricultural advisor to EPA Administrator Andrew Wheeler.

*The Center for Biological Diversity is a national, nonprofit conservation organization with more than 1.7 million members and online activists dedicated to the protection of endangered species and wild places.*

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